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14 Attorneys for Twain GL XXV, LLC

15 UNITED STATES BANKRUPTCY COURT

16 CENTRAL DISTRICT OF CALIFORNIA – NORTHERN DIVISION

17 In re:

18 SA HOSPITAL ACQUISITION GROUP, LLC

19 Debtor.

20 Case No. 9:23-bk-10690-RC

21 Chapter 11

22 **DECLARATION OF ANTHONY P.  
23 CALI RE SERVICE OF TWAIN GL  
24 XXV, LLC'S MOTION TO DISMISS  
25 CHAPTER 11 CASE**

26 Date: August 18, 2023  
27 Time: 11:00 a.m.  
28 Place: 411 West Fourth Street  
Santa Ana, CA 92701  
Courtroom 5D

29 I, Anthony P. Cali, pursuant to 28 U.S.C § 1746, hereby declare as follows:

30 1. I am a Partner at Stinson LLP, counsel for Twain GL XXV, LLC (“Twain”).

31 Except where indicated, the facts stated herein are based upon my own personal knowledge and if  
32 called upon to do so, I could and would competently testify thereto.

33 2. On August 16, 2023, prior to 5:00 p.m. (Pacific Time), I personally spoke with  
34 counsel for the following creditors and provided notice of the hearing on August 18, 2023 at

1 11:00 a.m. on Twain's pending motion to dismiss the bankruptcy case. I also received (or  
2 confirmed) email addresses for each of the counsel. After the call, I subsequently sent the same  
3 counsel copies of the below documents via email: (i) *Notice of Hearing on Twain GL XXV, LLC's*  
4 *Motion to Dismiss Chapter 11 Case* [Dkt. No.11] (ii) *Motion to Dismiss Chapter 11 Case* [Dkt.  
5 No. 5], (iii) *Order Granting Application and Setting Hearing on Shortened Notice* [Dkt. No. 9]  
6 and (iv) the Debtor's Voluntary Petition [Dkt. No. 1] (the "**Notice Package**"):

7 a. Aya Healthcare  
8 b. Aztec Leasing  
9 c. Cardinal Health  
10 d. EASI  
11 e. IWC Innovations  
12 f. Medtronic  
13 g. Nomad Nurses  
14 h. Metropolitan St. Louis Sewer District  
15 i. MorrisAnderson & Associates (the State Court Receiver)

16 3. On August 16, 2023, prior to 5:00 p.m. (Pacific Time), I personally spoke with  
17 representatives of following creditors and provided notice of the hearing on August 18, 2023 at  
18 11:00 a.m. After the call, I subsequently sent representatives of these creditors copies of the  
19 Notice Package via email to email addresses provided to me or confirmed for me on the phone:

20 a. AMN Healthcare  
21 b. Nursefinders (subsidiary of AMN Healthcare)  
22 c. TVT 2.0 LLC  
23 d. Western Healthcare

24 4. On August 16, 2023, prior to 5:00 p.m. (Pacific Time), I called and left messages  
25 with representatives of following creditors to provide notice of the hearing on August 18, 2023 at  
26 11:00 a.m. After the call, I subsequently sent representatives of these creditors copies of the  
27 Notice Package via email. Calls and emails were made according the last known contact  
28 information on file with the State Court Receiver:

SNELL & WILMER  
L.L.P.  
LAW OFFICES  
600 ANTON BLVD, SUITE 1400  
COSTA MESA, CALIFORNIA 92626-7689

- 1 a. Allscripts Healthcare (a/k/a Veradigm)
- 2 b. Andrew Friedman
- 3 c. Comphealth
- 4 d. Medline
- 5 e. Missouri State Taxes
- 6 f. Modern HR

7 5. On August 16, 2023, prior to 5:00 p.m. (Pacific Time), I also called a number on  
8 file with the State Court Receiver for SA Hospital Jefferson LLC and left a message regarding the  
9 hearing. I also emailed the Notice Package to Jeff Ahlholm, who was listed by the Receiver as a  
10 representative of that creditor. Mr. Ahlholm emailed me back and forwarded the Notice Package  
11 to counsel—the counsel for the Debtor. SA Hospital Jefferson LLC appears to be an entity related  
12 to the Debtor or the Debtor's insiders.

13 I declare under penalty of perjury of the United States of America that the foregoing is  
14 true and correct.

15  
16 Dated: August 17, 2023

17 By:   
18 Anthony P. Cali  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 600 Anton Blvd., Suite 1400, Costa Mesa, CA 92626.

A true and correct copy of the foregoing document entitled (specify): **DECLARATION OF ANTHONY P. CALI RE SERVICE OF TWAIN GL XXV, LLC'S MOTION TO DISMISS CHAPTER 11 CASE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) August 17, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Michael Jay Berger** michael.berger@bankruptcypower.com, yathida.nipha@bankruptcypower.com; michael.berger@ecf.inforuptcy.com
- **Brian David Fittipaldi** brian.fittipaldi@usdoj.gov
- **United States Trustee (ND)** ustpregion16.nd.ecf@usdoj.gov

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) xxxx, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) xxxx I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

8/17/23 Kelley Nestuk  
\_\_\_\_\_  
Date Printed Name

/s/Kelley Nestuk  
\_\_\_\_\_  
Signature